Compliance Letter

FCC Reporting Packet
In Response to the FCC Public Notice Issued on November 7th, 2005
WC Docket No. 05-169

SipStorm, Inc.
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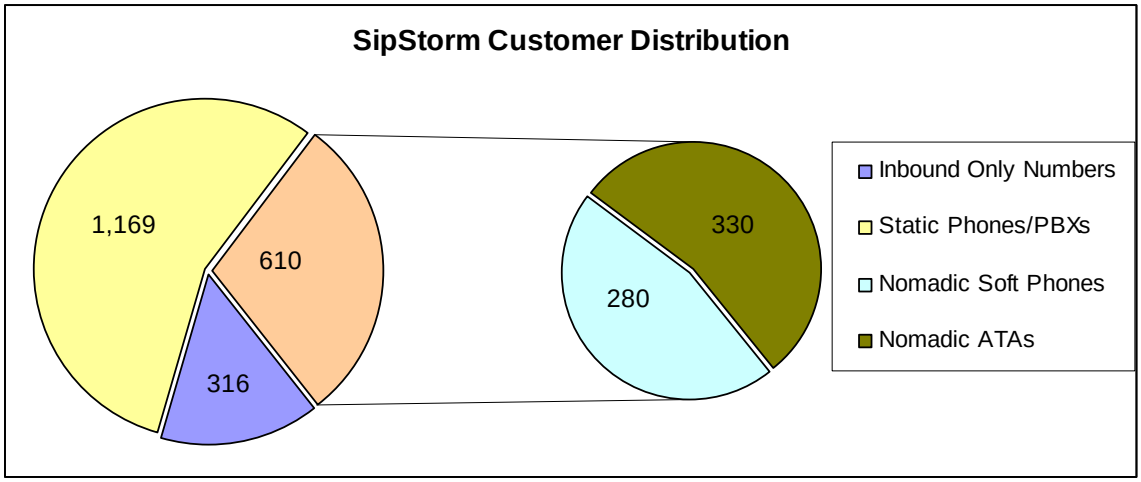
SipStorm 911 Solution:

SipStorm, Inc is a VoIP provider based in Tampa, Florida. SipStorm is leveraging two different 911 providers to comply with the FCC VoIP 911 Order: Level3 and Telefinity Dash911. All customers with a potentially nomadic device will be set up using Dash 911. All customers with static devices (devices that are mounted to a wall, PBXs and/or devices that require a specific IP) will leverage the existing Level3 911 infrastructure.

Previously, our entire 911 solution was provided by Level3. No potential digital home phone replacements were sold in areas outside of the Level3 911 serviceable area. The SipStorm workflow logic now distinguishes between potentially nomadic numbers and static numbers at provisioning time. Potentially nomadic numbers will be loaded into the Dash911 system.



Today:

Customer base:

1,600+ total customers some of which have multiple products.
1,169 Static Phone numbers that can not be used nomadically
330 Potentially nomadic numbers
280 Softphone users
316 Inbound Phone Numbers which do not require 911

Description of today's 911 service offering:

100% of all VoIP home phone replacement offerings have supported 911 services via Level3 communications. On November 28th 2005 SipStorm had 1,779 phone numbers in service. Nomadic 911 is not supported on any phone numbers today. Any number defined as potentially nomadic can still be serviced by the Level3 911 system if the ATA or softphone is located at the originally provisioned address.

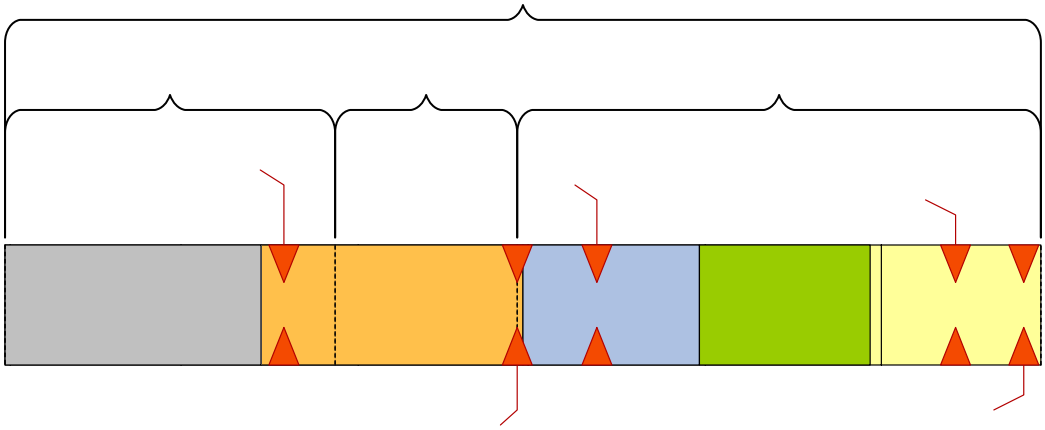
Terms

Static / Wireline:

- The ATA or PC cannot move, i.e., the service address is permanent
- Phone number and service address must match (212 XXX-XXXX = New York service address)
- Phone number and service address must be serviceable by a selective router

Nomadic / Wireless:

- The ATA or PC can move
- Phone number and service address do not need to match, e.g., New York service address but Dallas phone number
- The service address must be within the service providers' selective router/PSAP footprint
- If service address is not within footprint, service provider must alter or shut down service



Upon Deployment of our 911 solution: (To be completed by 12/31/2005)

100% of all VoIP home phone replacement offerings in service or installed after the upgraded 911 deployment is complete will have FCC compliant 911 services.

1,169 numbers on the SipStorm platform are defined as static today. All of those numbers and any new static numbers deployed will receive 911 service from Level3 Communications. These customers will not be allowed to travel with their phones.

100% of all customers with potentially nomadic VoIP phones will be able to change their emergency response address via the web or phone as long as they are changing their address to one within the Telefinity Dash911 serviceable area. Subscribers will not be allowed to change there service address to areas not supported by Dash911. Customers trying change to an unsupported address will be instructed that service can not be offered in that area.

330 numbers are defined as potentially nomadic today. Upon deployment these customers will be converted over to Dash911 for service of any emergency calls. All future potentially

nomadic customers will be loaded only into Dash911. Initially, this will be done with a bulk loading tool built by SipStorm using the Dash911 application interfaces.

Note: While Level3 does have a compliant 911 solution for both static and nomadic devices their nomadic solution proved too costly and cumbersome to implement within the time allotted.

For all of our potentially nomadic customers, The V9-1-1™ solution enabled by Telefinity Dash911 through Intrado will provide a true E9-1-1 solution. The solution provided by the Telefinity Dash911 affiliation with Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for SIPSTORM is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Specifically, Intrado manages the VPC functionality and the Call Delivery component on behalf of Telefinity Dash 911 thereby enabling SipStorm to take advantage of a full end-to-end solution from one E911 service provider.

The only SIPSTORM requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Telefinity Dash911 via a real-time interface and the PSTN connectivity to the Telefinity Dash911 network to enable live 9-1-1 call delivery. The real-time interface is via a SOAP API supplied by Telefinity Dash 911 to its SIPSTORM customers. SipStorm is in the process of testing this interface.

- **911 Routing Information/Connectivity to Wireline E911 Network**:

  Public Notice Requires*: A detailed statement as to whether the provider is transmitting, as specified in Paragraph 42 of the VoIP 911 Order, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized."*[1] *If the provider is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include a detailed explanation why not. In addition, the provider should quantify the number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005.*

  Currently through the assistance of our Network providers, each of Telefinity Dash911's SIPSTORM customers will have access to 154 E9-1-1 Selective Routers by November 28th, 2005 and the attached "Major Market Deployment Map" and the "VoIP Deployment Plan" reflects the major market deployment schedules. Note: the market deployment map represent major markets where Intrado has reported to Telefinity Dash911 that it has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.

- **Transmission of ANI and Registered Location Information:**

[1] *VoIP 911 Order*, 20 FCC Rcd at 10269-70, ¶ 42 (footnote omitted).

Public Notice Requires: *A detailed statement as to whether the provider is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if the provider is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.*

- **Basic PSAP:** Currently 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router. To illustrate PSAPs within the US, which are not served by a Selective Router, the enclosed "Basic 9-1-1 PSAP" map could be used as reference information. While these areas are not included within the FCC Order and are not required for compliance**,** Intrado reports that they are actively contacting these areas to determine technical options for VoIP E9-1-1 native call delivery.
- **ANI Only:** There are unique deployment circumstances in areas of the US and Puerto Rico that operates off E9-1-1 Selective Routers, but will not meet the full FCC mandate. Telefinity Dash911 has indicated that Intrado has noted that there are currently four (4) States and a Territory that will have native Selective Routing functionality but will provide Automatic Number Identification (ANI) only service to the PSAP. The following information explains the circumstances within these areas:

  New Jersey - In the State of New Jersey Intrado has obtained permission from the State to deploy a voice-only service which includes the call-taker receiving ANI on the VoIP 911 caller. The State ALI system is not capable of full dynamic ALI updates and will require an upgrade. New Jersey represents 3% of the total US population.

  Ohio - To date, Ohio has not granted permission to Intrado to deploy a voice-only solution. The State ALI system is not capable of full dynamic ALI update. Ohio represents 4% of the total US population.

  Hawaii - To date, Hawaii has not granted Intrado permission to deploy a voice-only solution. The ALI systems serving Hawaii are not capable of full dynamic ALI update. Hawaii represents 5% of the total US population

  Puerto Rico - To date, Puerto Rico has not granted permission to Intrado to deploy a voice-only solution. The ALI systems are not capable of full dynamic ALI update. Puerto Rico represents 3% of the total US population

- **SIPSTORM Specific Metrics: Please see included partner Maps. If specific rate center lists are required, that too can be provided.**

- **911 Coverage**:

  Public Notice Requires*: To the extent a provider has not achieved full 911 compliance with the requirements of the VoIP 911 Order in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.*

  - **Deployment Overview** – The Telefinity Dash 911 E911 solution uses Intrado as a backbone supplier and as such Intrado is the VPC and is working on nationwide native VoIP E9-1-1 delivery in accordance with the Commission Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on the SIPSTORM customer subscriber base priorities. The attached *"Major Market Deployment Map",* which corresponds with MSAs, identifies regions within our subscriber territory that have connectivity to at least one Selective Router, ALI steering capabilities, ANI and the ability to populate ALI. Telefinity Dash 911 has advised us that these areas are planned for deployments by November 28, 2005; March 31, 2006 and June 30, 2006. This intention of this map is to demonstrate FCC compliance for the November 28th requirements and the future deployment strategy.

Obtaining Initial Registered Location Information:

Public Notice Requires*: A detailed description of all actions the provider has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location. This information should include, but is not limited to, relevant dates and methods of contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the provider has obtained the Registered Location.*

SipStorm required all customers to enter their 911 service address upon installation. SipStorm notified all customers during their initial sign up process that any change of service address would require a new telephone number. Our records are up to date for all existing customers to the best of our knowledge. Upon deployment of the Telefinity Dash 911 E911 solution all customers with potentially nomadic phone numbers will receive a notification about the SipStorm address change portal and the Dash911 call center number detailed in the next section.

Obtaining Updated Registered Location Information:

Public Notice Requirements*: A detailed description of the method(s) the provider has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the provider is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.*

As a component of the Telefinity Dash911 Service we have access to a near real-time address update system provided to us by Telefinity Dash911. This allows us to have near real-time delivery of the subscriber's address and also allows us as SIPSTORM to submit a subscriber's address update information directly. The system allows us to have the

subscriber input his initial address into the system at the time of initially signing up for our VoIP service. Addresses submitted are subjected to an immediate screening against the US Postal Service Street Address Guide in order to immediately determine if the submitted address is a valid address.

Subscribers have more than one option to input, update or change their address. Subscribers can easily and quickly update their Registered Location by either (a) online via our website, or (b) use the Telefinity Dash911 telephone touch tone (IVR) system to either select another pre-registered address that the subscriber may already have on file, or to ask for an operator who will make the address change while the customer is on the phone.

At the time of an emergency VoIP 9-1-1 call, Telefinity Dash 911 passes the call directly to Intrado's call routing system. Intrado's call routing system uses the customer's provisioned information to associate the latitude and longitude assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid Address and Call Back Number of the user.

Telefinity Dash 911 also offers to us, as SIPSTORM a newly-released product called "Level of Service (LoS) Query" that we can choose to integrate into our application. This functionality enables us to make a real-time query with an address of a customer/end user for the purpose of determining the level of 9-1-1 service available to that customer based on their location. Intrado will return a set of responses (Enhanced, Basic, etc.) that will enable us or our user to determine the level of 9-1-1 service available at that address and take appropriate action.

Technical Solution for Nomadic Subscribers:

Public Notice Requirements: *A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.*

All SipStorm customers with potentially nomadic numbers will be provisioned using Telefinity Dash911's E911 for VoIP service. We are able to route VoIP emergency calls from our VoIP network to Telefinity Dash 911's Intrado Network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 9-1-1 infrastructure. The Services utilized provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V9-1-1 solution enables full support of nomadic usage of VoIP provided the user updates their address information prior to dialing 911 at a new location/address. Through the Telefinity Dash 911 interface, the 9-1-1 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly-provisioned address and make available (assuming no errors outside SipStorm control) that particular user's information for delivery to the PSAP within an average of 15 minutes of receipt of the new Registered Location address information.

We recognize the universal desire to remove the user interaction and self-provisioning component of the current 9-1-1 solution. To that end, we understand that Telefinity Dash 911, along with Intrado, is actively working on a number of "location determination" technologies. Should a solution be developed SIPSTORM will seek to implement as soon as feasible

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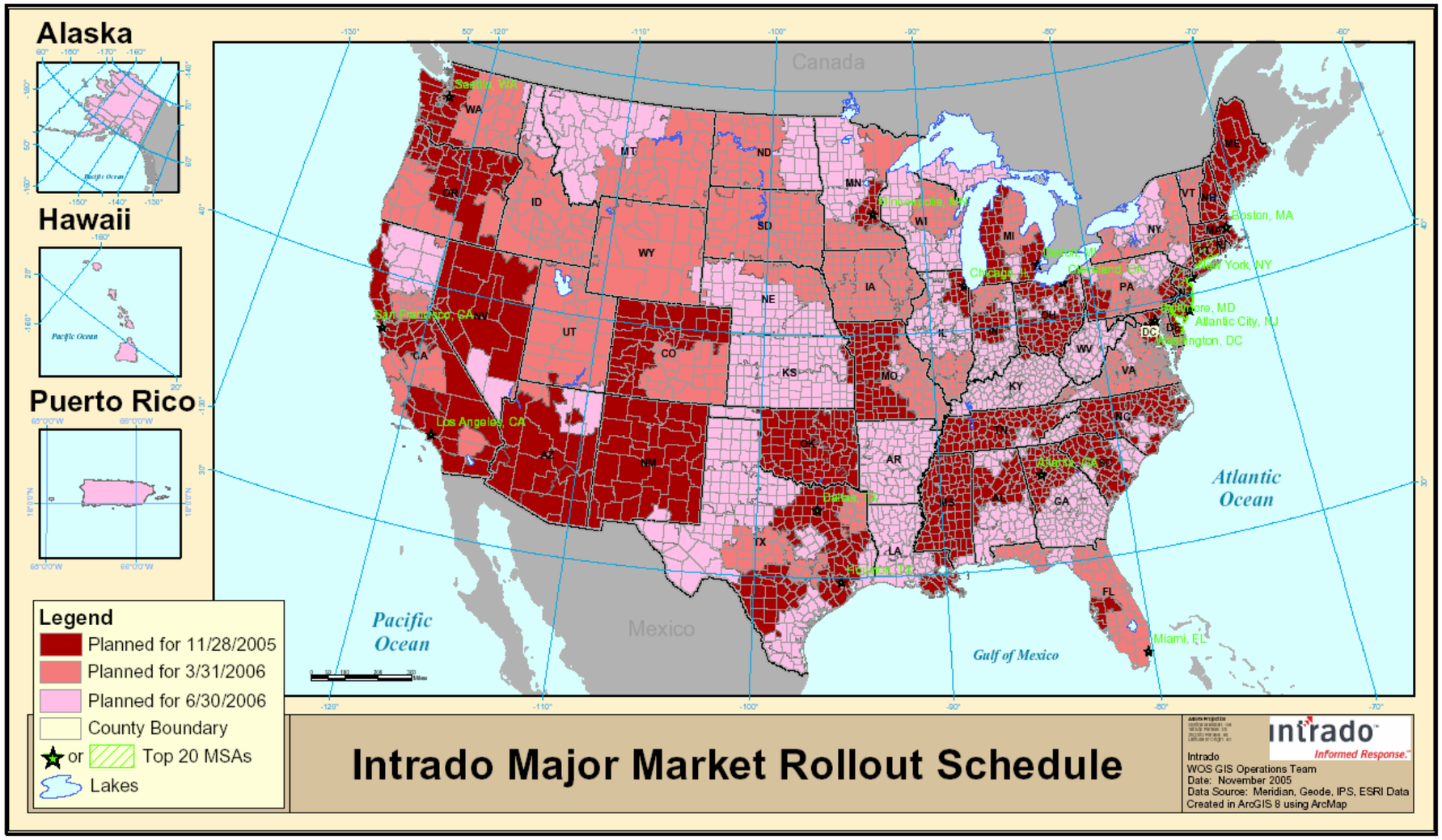

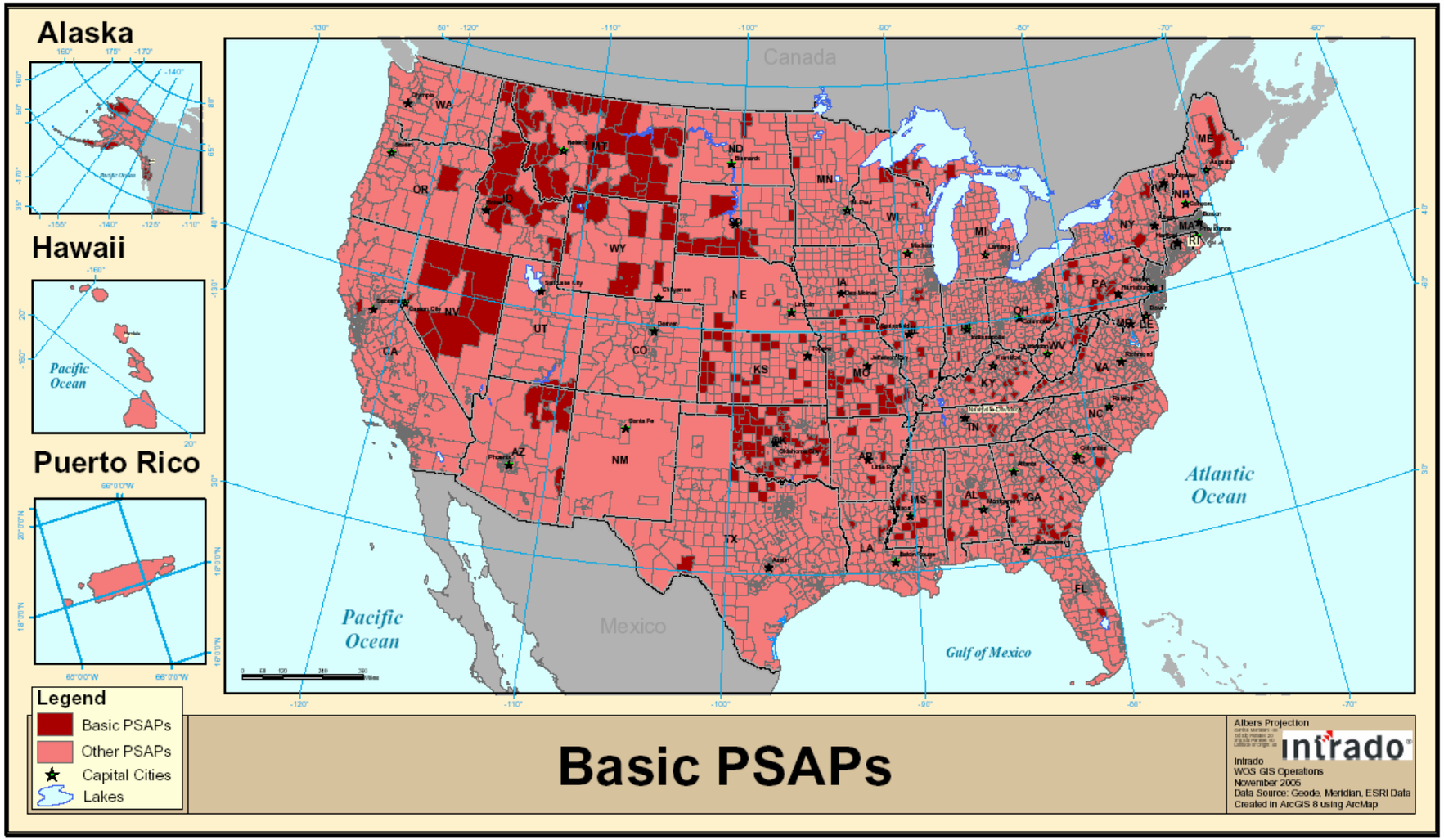

Level 3 E-911 Coverage

- Today, Level 3 delivers E-911 enabled VoIP service to areas encompassing approximately 66% of U.S. Households
  - In the 10 largest MSAs, Level 3 covers greater than 91% of the population with E-911
- Level 3 offers greater E-911 coverage for VoIP providers than any single carrier, including the largest RBOCs
- Level 3 is the key supplier of E-911 service to a wide range of cable companies, ISPs, carriers and other VoIP access providers
- Level 3 is continuing to expand the footprint and plans to cover more than 70% of U.S. Households by end of year